

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
JOHN DOE,)	
Plaintiff)	CIVIL ACTION NO.: 3:16cv-30184
)	
v.)	
)	
WILLIAMS COLLEGE,)	
)	
Defendant.)	
)	

**MOTION TO PROCEED UNDER PSEUDONYM
AND FOR PROTECTIVE ORDER**

Plaintiff John Doe (“Plaintiff”), by and through his attorney, hereby seeks authorization to proceed under a pseudonym in the above-captioned case. In light of the serious nature of the allegations contained in the complaint, Plaintiff is concerned about acts of reprisal that could prevent Plaintiff from proceeding with his education, his career, or that could cause him physical or mental harm should his name be disclosed to the public. Therefore, Plaintiff moves the Court for the entry of: (i) an order granting Plaintiff leave to proceed under a pseudonym; and (ii) a protective order (a) prohibiting Defendant and its agents from disclosing Plaintiff’s identity to any third party other than necessary to defend against this action; (b) ordering that if any party files a document in the public record that would otherwise identify Plaintiff, the filing party shall redact personal identifiers consistent with this Order and Fed. R. Civ. P. 5.2; and (c) ordering that such informed third parties shall be provided a copy of the Court’s order

and shall not identify Plaintiff other than as may be necessary with respect to this action.

Plaintiff has provided the Court, under seal, a signed copy of his affidavit that contains his true identity. Plaintiff requests that the impoundment last in perpetuity or until further order of the court. A memorandum of law in support and proposed order accompany this motion.

Date: November 23, 2016

Respectfully submitted,

JOHN DOE
PLAINTIFF

By: /s/ Stacey Elin Rossi
STACEY ELIN ROSSI, BBO# 681084
ROSSI LAW FIRM
P.O. Box 442
Hoosick Falls, New York 12090
(413)248-7622

CERTIFICATE OF SERVICE

I, Stacey Elin Rossi, Attorney for Plaintiff John Doe, HEREBY CERTIFY that this document in connection with the above-captioned proceeding, filed through the Electronic Case Filing System (CM/ECF), will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 23, 2016.

/s/ Stacey Elin Rossi
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